

# **Bellevue School District**



## **Equity Advisory Group Report March 5, 2019**

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## Policy Review Approach

1. Overview of the most relevant 2000, 3000 and 4000-series policies by John Harrison
2. EAG committee members review all policies outside of meeting time
3. EAG study all policies more closely in small groups during EAG meetings
4. Create and use a Framework to assess all policies to ascertain those needing revision
5. Framework Assessment process yields 52 policies needing review or revision
6. Additional EAG reading on the 52 policies outside of meeting time
7. Dot voting to identify those needing revision most urgently. See sample image to the right.
8. (Donations policy was originally included but was set aside because a separate committee has recently made recommendations on this policy)
9. Groups sign up to work on these 8 policies using Equity Tool

**"3000" series: students**

	3205 - Sexual Harassment
•••	3207 - HIB
•••••	3210 - Nondiscrimination
	3220 - Freedom of Expression
	3224 - dress
	3240 - conduct
•••••	3241 - class mgmt
	3421 - child abuse
	3520 - Fees, Fines, charges

**"2000" series: Instruction**

•••••	2020 - CURRIC DEV
	2024 - Online Learning
	2021 - Library media
	2022 - Electronic resources
	2108 - Learning Assistance
•••••	2110 - Bilingual
•	2140 - counseling
•	2145 - suicide prevention
	2150 - CO-CURRIC
	2151 - Inter-schol
	2153 - student groups
•••••	2161 - spec ed

## Policies Most Needing Revisions

1. 4220: Complaints Regarding Staff or Programs
2. 4130: Parent Involvement
3. 2110: Transitional Bilingual Instruction
4. 2161: Special Education
5. 2020: Curriculum Development
6. 2190: Highly Capable Program
7. 3241: Classroom Management, Corrective Actions or Interventions
8. 3210: Non-Discrimination

## **Policy 2020 – Curriculum Development and Adoption of Instructional Materials**

**Reviewers: Lynn Juniel, LeAnn Tuupo, Myra Arnone**

### **1. Which student groups (racial/ethnic, special needs, ELL) are most affected by this policy? What are the potential impacts on these groups?**

- All students are impacted by the selection of curriculum. These resources include materials, methods of employment (pedagogy strategies), as well as assessments.
- Impacts – lack of relevance and reflectiveness of populations – races, ethnicities, sexuality, ability, etc.

### **2. Does this policy or procedure ignore or worsen existing disparities or produce other unintended consequences? How?**

- Unintended consequences – access to newer research-based social justice and inclusive material
- Worsen – if the process to adopt curriculum is too long, the potential timeline for adoption doesn't allow for efficient responsiveness in meeting students' cultural needs.
- Set timelines can impede progress or impede the ability of the teacher to implement.
- Adoption process currently does not recognize the cross-content areas theme approach. This results in inequitable approach to address inclusion across all content areas at once.

### **3. Does the policy educate about the history and current realities regarding race, racism, special needs, ELL and the opportunity gap?**

- Creates a space, but does not mandate the need.
- Teacher discretion plays a role in delivery and final implementation so students at the same school in same course with different teacher can have very different experiences.
- The way some literature is represented has been a problem for historically marginalized groups.
- Teacher training to successfully implement curriculum and lessons with cultural sensitivity.
- Standards may not be aligned to reflect practices in cultural sensitivity or diverse perspectives

### **4. What about this policy poses problems or barriers to more equitable outcomes? (mandated, political, emotional, financial, programmatic, managerial).**

- See above
- Time, BEA contract language, teacher personal beliefs, biases, readiness, lack of training.
- Time for teachers to dive into the material, planning – thematic design to ensure inclusion is addressed at all levels and courses.

<ul style="list-style-type: none"> <li>• How are parents notified? Is language translation, access -print, online about the opportunity to engage? Is the message about the opportunity coming from a trusted, consistent source (ie. Bulletins)</li> </ul>
<p><b>5. What additional information could be added to strengthen the policy?</b></p> <ul style="list-style-type: none"> <li>• Examples of innovative curriculum, approaches to bring these materials holistically into the school.</li> <li>• Language around training for BEA – supporting teacher implementation in systemic, building, group, and individualized manners.</li> <li>• Strengthening of policy may be achieved by ensuring that there is intentionality of delegation for the responsibility of selecting staff adoption committee.</li> <li>• Curriculum embedded with cultural representation spread over the instructional units over the entire span of the year.</li> <li>• BEA partnership to ground the work in contract language as an aspect of teacher professionalism.</li> </ul>
<p><b>6. How does/could the policy promote opportunity or access for those who have been historically excluded? How can this policy benefit all students equitably?</b></p> <ul style="list-style-type: none"> <li>• Accountability, language updates in Policy 2020 to introduce, strengthen, reinforce a more inclusive process in adoption. Also increased focus on multiple perspective representation.</li> <li>• Multi-lingual materials in libraries and for curricular purposes- ensuring that there are culturally responsive and reflective of school demographics, having a budget that prioritizes these efforts.</li> </ul>
<p><b>7. Does the policy make provisions for accountability? What are they?</b></p> <p>None at this time.</p>
<p><b>8. What community involvement is warranted by updates to this policy?</b>  Are multiple perspectives represented on the IMC? Who is present/absent?  Certain programs that are prescriptive (AP, gifted, SPED, ELL, etc.)</p>

**After conducting the analysis:**

**What recommendations do you make for this policy?**

1. Efforts to diversify instructional materials committee to represent a wide variety of stakeholders – protocol?
2. How are parents notified -
3. Are the leaders of our community groups being engaged directly in the recruitments efforts to engage diverse parent perspectives?
4. Consider reviewing content standards under practices of inclusion and diversity.

5. District, building, and department budgets aligned to ensure the prioritization of curricular materials that reflect culturally-responsive and inclusive efforts.

**What resources are needed to make changes?**

1. A guiding BSD equity policy with clear goals regarding the use of specific equity lenses towards the development, refinement, revision of curricular content and pedagogy.
2. Prioritize adequate budget and resources to meet fulfill goals of equity and inclusion.
3. Training for curriculum development leads and teachers willing to facilitate and pilot this work around the district.

**What are other next steps?**

1. Potential development of an equity advisory work group that develops and provides guidelines for the selection, revision, or refinement of curriculum.
2. Training for BSD curriculum leads to develop the work in specific content areas.

## Policy 2110 - Transitional Bilingual Instruction Program

Reviewers: Alma Gonzalez, Miriam Lara, Haruka Kojima

<p><b>1. Which student groups (racial/ethnic, special needs, ELL) are most affected by this policy? What are the potential impacts on these groups?</b></p> <p>ELL students and parents are most affected by this policy.</p> <p>All students and teachers are affected indirectly by this policy, because ELL students can't have effective communication with students in general education classrooms and teachers.</p>
<p><b>2. Does this policy or procedure ignore or worsen existing disparities or produce other unintended consequences? How?</b></p> <p>This policy ignores parents' view of implementation of programs. The policy looks good on paper, but there is no connection with parents.</p>
<p><b>3. Does the policy educate about the history and current realities regarding race, racism, special needs, ELL and the opportunity gap?</b></p> <p>No.</p>
<p><b>4. What about this policy poses problems or barriers to more equitable outcomes? (mandated, political, emotional, financial, programmatic, managerial).</b></p> <p>ELL students don't receive appropriate instruction. ELL students are not as advanced as students in general education classrooms. This policy doesn't make intentional communication with affected communities, such as Boys &amp; Girls Club, Jubilee REACH, YMCA and YES.</p>
<p><b>5. What additional information could be added to strengthen the policy?</b></p> <p>BSD should engage with communities and stakeholders.</p>
<p><b>6. How does/could the policy promote opportunity or access for those who have been historically excluded? How can this policy benefit all students equitably?</b></p> <p>If School District has effective implementation plan for the program, teachers can teach ELL students more easily.</p> <p>The policy should promote community building.</p>
<p><b>7. Does the policy make provisions for accountability? What are they?</b></p> <p>What is the exact "procedure"?</p> <p>Where is supervision?</p>
<p><b>8. What community involvement is warranted by updates to this policy?</b></p> <p>Engage in open communication with parents and affected communities. Invest in a communication plan to reach out.</p>

**Overall comments:**

1. Current ELL teaching model is not working, especially in Middle and High School level. ELL students' academic level lags behind and can't catch up with students in general classes.
2. There is not open communication with parents.
3. BSD's ELL department needs to reach out to affected communities.
4. BSD should invest in effective communication plan which reach out affected communities.
5. There is no collaboration with resources, such as Jubilee REACH, Boys & Girls Club, YMCA or Youth Eastside Services
6. BSD should have report and feedback from ELL students and parents before school year end, so that BSD can work in summer to reflect the suggestions and recommendations for new school year's program.

**What recommendations do you make for this policy?**

OSPI has updated languages on Transitional Bilingual Instruction. The Group members worked with BSD's Director of Program for Multilingual Learners to update the languages.

**What are other next steps?**

The Group members recommend that BSD should produce their own inner implementation policy for Multilingual Learners. The inner policy should have accountable communication plan with parents, which is not only in writing, but also physical meetings with parents of Multilingual Learners with interpreters.



## Policy 3210 – Non Discrimination

Reviewers: Haruka Kojima, Jill Rock, Pia Dey

<p><b>1. Which student groups (racial/ethnic, special needs, ELL) are most affected by this policy? What are the potential impacts on these groups?</b></p> <p>Student groups (Racial, ethnic, ELL and Special needs) are all affected by this policy. The subgroups who are not included are as follows:</p> <ul style="list-style-type: none"><li>a) Students with disparate socio-economic status</li><li>b) Different academic abilities</li><li>c) Multilingual (ELL)</li><li>d) Citizenship status</li></ul>
<p><b>2. Does this policy or procedure ignore or worsen existing disparities or produce other unintended consequences? How?</b></p> <p>Currently if a student felt discriminated against for being part of any of the sub groups above, there is no way to assure them protection per the current policy.</p>
<p><b>3. Does the policy educate about the history and current realities regarding race, racism, special needs, ELL and the opportunity gap?</b></p> <p>The Policy does not educate about the history and current realities around, race, racism, ELL, special needs and the opportunity gaps. We recommend these issues be addressed in the primary Equity Policy of the school district which is overarching.</p>
<p><b>4. What about this policy poses problems or barriers to more equitable outcomes? (mandated, political, emotional, financial, programmatic, managerial).</b></p> <p>The exclusion of the stated subgroups creates barriers to equitable outcomes (mandated, political, emotional, financial, programmatic and managerial).</p>
<p><b>5. What additional information could be added to strengthen the policy?</b></p> <p>The inclusion of these subgroups and the reference of the historical realities of discrimination in the overall Policy strengthens this Policy imperatives.</p>
<p><b>6. How does/could the policy promote opportunity or access for those who have been historically excluded? How can this policy benefit all students equitably?</b></p> <p>Currently these subgroups are not explicitly called out in the Policy and the school authorities do not feel the onus to manage these discrimination cases.</p>
<p><b>7. Does the policy make provisions for accountability? What are they?</b></p> <p>None at this time.</p>
<p><b>8. What community involvement is warranted by updates to this policy?</b></p>

**What recommendations do you make for this policy?**

We need education and training made available to school, staff, students and parents on these various discriminations and they should be made accessible in multiple languages.

**Program/service/procedural suggestions:**

1. Clearly delineate the Scope of work for the Accountability Manager or the Director of Employee Relations per the procedure outlined.
2. We also have a section on Training without clear outline of who, when, what and how of the training responsibility that lies with the Superintendent of school is going to be executed.

**What resources are needed to make changes?**

4. A guiding BSD equity policy with clear goals that will educate on the history and current realities around race, racism, ELL, special needs and the opportunity gaps

## **Policy 3241 - Classroom Management, Corrective Actions and or/Interventions**

**Reviewers: Maria Ocampo, Lynn Juniel & Ana Garcia**

<p><b>1. Which student groups (racial/ethnic, special needs, ELL) are most affected by this policy? What are the potential impacts on these groups?</b></p> <ol style="list-style-type: none"><li>1. Our students of families of color need to feel supported through the process and during interventions</li><li>2. All students should be taken into consideration, so the policy doesn't result in loss of education for students NOT involved in corrective actions.</li></ol>
<p><b>2. Does this policy or procedure ignore or worsen existing disparities or produce other unintended consequences? How?</b></p> <ol style="list-style-type: none"><li>1. This policy needs to be reviewed to take in account other students impacted in school.</li><li>2. Vocabulary is too vague and may produce unintended consequences.</li></ol>
<p><b>3. Does the policy educate about the history and current realities regarding race, racism, special needs, ELL and the opportunity gap?</b></p> <p>No.</p>
<p><b>4. What about this policy poses problems or barriers to more equitable outcomes? (mandated, political, emotional, financial, programmatic, managerial).</b></p> <p>This policy is too long, complicated and vague. It's hard for families to understand, let alone those families from diverse backgrounds and families with more than one job (who don't have time to read a lengthy policy).</p>
<p><b>5. What additional information could be added to strengthen the policy?</b></p> <ol style="list-style-type: none"><li>1. Steps could be simplified</li><li>2. Better organization</li><li>3. Improve vocabulary so it is more precise</li><li>4. Add specific outcomes</li></ol>
<p><b>6. How does/could the policy promote opportunity or access for those who have been historically excluded? How can this policy benefit all students equitably?</b></p> <ol style="list-style-type: none"><li>1. Accessibility, language, simplified vocabulary, support during processes of those involved.</li><li>2. Training on accountability and policy reviews for those associated to the policies.</li></ol>
<p><b>7. Does the policy make provisions for accountability? What are they?</b></p> <p>Not that we're aware of.</p>
<p><b>8. What community involvement is warranted by updates to this policy?</b></p> <p>Representation of as many diverse groups as possible should work together to fully read and make sure this policy is understandable, precise, accountable and includes every group represented in our district.</p>

**What recommendations do you make for this policy?**

1. Review with all parties involved in this important policy: parents from diverse groups, administrators, teachers.
2. Make it more manageable, and easier to understand for everyone, including community members.

## Policy # and Title: 4220 - Complaints

Reviewers: Ana Garcia & Maria Ocampo

### 1. Which student groups (racial/ethnic, special needs, ELL) are most affected by this policy?

#### What are the potential impacts on these groups?

- Students of color, student with special needs, students who are ELL, students who are from a non-affluent background are most affected by this policy.
- Families/groups who are unfamiliar or new, to navigating the complaint process are highly impacted by the district policy as it can be intimidating and off-putting.

### 2. Does this policy or procedure ignore or worsen existing disparities or produce other unintended consequences? How?

The language in the policy procedure, "For complainants whose first language is not English, the district will make every effort to provide an interpreter to assist the complainant in resolving their concerns and complaints" perpetuates a "non-English" deficit view and is divisive. It should be rewritten to be inclusive of our multilingual families and communities.

Although it may not be possible to provide all policies and procedures in the variety of languages that are a part of our student and family community, it should be clearly stated that our district acknowledges this inequity and will strive to provide as much translation and interpretation as possible.

### 3. Does the policy educate about the history and current realities regarding race, racism, special needs, ELL and the opportunity gap?

The policy does not provide any of this information.

### 4. What about this policy poses problems or barriers to more equitable outcomes? (mandated, political, emotional, financial, programmatic, managerial).

The policy is not reader-friendly for someone who does not work in, or is unfamiliar with, policy writing which creates a problematic barrier in equitably reaching all families. Without a point-person to guide families in this complaint process (whether reading policy, writing complaint, follow-up on steps and process) we are failing to provide equitable access to all students, families and community members.

### 5. What additional information could be added to strengthen the policy?

1. Step by step process that is clearly written similar to those found in Baltimore City Schools Dist. as well as definitions of key language (complaint, complainant, respondent, council, written notice, etc.), thus providing a better understanding of complaint process which provides equitable access to all parties submitting a complaint.
2. Language stating BSD's commitment to offering the support of a point-person to help with informal and formal processes of filing a complaint (similar to FCC providing support to families) and not limited only to "possible" interpreters. This will promote

understanding and awareness of our families' needs when having to follow formal process, that at times may be new or unfamiliar.

3. Language that clearly states that complaints are evidence based as seen in Minneapolis SD policy:
  - "presentation of the facts as he/she sees them."
  - "purposes of presenting facts, making further explanations and clarifying the issues"
  - "Hearsay and rumor shall be discounted as well as emotional feelings, except those
  - directly related to the facts of the situation."

**6. How does/could the policy promote opportunity or access for those who have been historically excluded? How can this policy benefit all students equitably?**

1. The policy procedure has the potential to benefit all students in an equitable manner so long as it is clear for all stakeholders. Unfortunately, many of us are unfamiliar with policy and can be or feel intimidated by the process.
2. Providing resource access (a point-person for guidance, interpreters and translated documents) to students, families and community members in an equitable way (information at all school and district sites, staff that are informed in supporting this process) helps benefit all students equitably.
3. Rewriting this policy with definitions of crucial terminology, clearly listed steps to follow and providing someone to guide families in the complaint process would truly build bridges in reaching all, especially for our families and students of color.

**7. Does the policy make provisions for accountability? What are they?**

Accountability provisions are based on a timeline and whether the complainant followed the delineated steps. The first steps are meeting with all parties involved in the complaint with final appeals "to the Superintendent of Public Instruction, other agencies or the courts, as provided by law." However, accountability per complaint varies depending on whether the complaint is transferred for review under a separate policy process.

**8. What community involvement is warranted by updates to this policy?**

It would be helpful to get community input from those who have navigated or attempted to navigate the complaint process, with a focus on our more underserved communities (students and families of color, families of students with special needs, families of students who are ELL, immigrant families, etc.). This information would shed light on how equitable, if at all, this process has been in the past.

**What recommendations do you make for this policy?**

- 1) Step by step process that is clearly written similar to those found in Baltimore City Schools Dist. as well as definitions of key language (complaint, complainant, respondent, council,

written notice, etc.), thus providing a better understanding of complaint process which provides equitable access to all parties submitting a complaint.

2) Language stating BSD's commitment to offering the support of a point-person to help with informal and formal processes of filing a complaint (similar to FCC providing support to families) and not limited only to "possible" interpreters. This will promote understanding and awareness of our families' needs when having to follow formal process, that at times may be new or unfamiliar.

3) Language that clearly states that complaints are evidence based, as seen in Minneapolis SD policy:

- "presentation of the facts as he/she sees them."
- "purposes of presenting facts, making further explanations and clarifying the issues"
- "Hearsay and rumor shall be discounted as well as emotional feelings, except those directly related to the facts of the situation."

#### **What resources are needed to make changes?**

Review of other district complaint policies where an Equity Policy is in place

#### **What are other next steps?**

Possible input from district/community members.

## Policy 2161 – Special Education

Reviewers: Jill Rock, Suzie Pietz

<p><b>2. Which student groups (racial/ethnic, special needs, ELL) are most affected by this policy? What are the potential impacts on these groups?</b></p> <p>All special education students including intersections with ELL students and students of color</p>
<p><b>2. Does this policy or procedure ignore or worsen existing disparities or produce other unintended consequences? How?</b></p> <p>The implementation of procedures may lead to unintended consequences. The policy lists 15 areas addressed in the procedures. We recommend delving further into the procedures of the policy to provide clarification on unintended consequences.</p>
<p><b>3. Does the policy educate about the history and current realities regarding race, racism, special needs, ELL and the opportunity gap?</b></p> <p>No. We recommend adding this information in this policy, and/or having a disclaimer to refer to the overall Equity Policy for history and current realities.</p>
<p><b>4. What about this policy poses problems or barriers to more equitable outcomes? (mandated, political, emotional, financial, programmatic, managerial).</b></p> <p>No. We recommend adding these to the list of items addressed in the procedures and providing further information within the procedures.</p>
<p><b>5. What additional information could be added to strengthen the policy?</b></p> <ol style="list-style-type: none"><li>1. Related services need to be addressed such as OT/PT/SLP. Related services are in the title of the policy, however not addressed in the policy.</li><li>2. We recommend reviewing and adjusting the order of bullets (ex. FAPE should be addressed before mediation).</li></ol>
<p><b>6. How does/could the policy promote opportunity or access for those who have been historically excluded? How can this policy benefit all students equitably?</b></p> <p>The policy does not address those who have been historically excluded. However, the policy dictates that not all students are eligible for special education services and needs of those students may be addressed under the Section 504 of Rehabilitation Act.</p>
<p><b>7. Does the policy make provisions for accountability? What are they?</b></p> <p>The board authorizes the superintendent or a designee to bind the district to a mediation or resolution agreement. The district superintendent will develop and maintain special education procedures necessary to implement this policy.</p>
<p><b>8. What community involvement is warranted by updates to this policy?</b></p> <p>While the policy addresses that parents be a part of creation of student-specific educational plans, parent perspective should be considered when addressing barriers (such as emotional) to more equitable outcomes.</p>



## Policy 2190 Highly Capable

Reviewers: Keri Dutton and Jennifer Hodges

### 1. Which student groups (racial/ethnic, special needs, ELL) are most affected by this policy? What are the potential impacts on these groups?

Underrepresented student groups include: ELL, Special Education, Black and Latino students. They are affected in that they are under identified for gifted services. There are also BSD racial groups that appear over-identified for gifted services. These data gaps demand taking a closer look at the processes for accessing gifted services to ensure its composition is more accurate of our racial/group demographic. See chart below:

BSD gifted data; compiled for the Equity Committee

Race	Number of Students	Percentage within Advanced Learning Population	Percent within the Bellevue School District- enrollment data Oct. 2018
Asian	2110	76.8	39.9
Black	>20		2.69
Hawaiian/Pacific Islander	>20		.20
Hispanic/Latino	28	1.02	11.89
Multi-Racial	165	6.1	9.18
White	428	15.6	36.69

Race	Number of Students	Percentage within Advanced Learning Population	Receiving Special Education Services	Receiving ELL Services	Receiving 504 Services	Receiving FRL
Asian	2110	76.8	<20	27 .98	44 1.6	31 1.1
Black	12	0.44			<20	<20
Hawaiian/Pacific Islander	1	-				
Hispanic/Latino	28	1.02	<20		<20	<20
Multi-Racial	165	6.1	<20		<20	<20
White	428	15.6	<20		39 1.4	<20
Total	2,744		40 1.5	27 .98	107 3.9	52 1.9

The potential impact for affected groups includes:

1. Lack of identification
2. Lack of services
3. Narrow opportunity to be identified for gifted

**2. Does this policy or procedure ignore or worsen existing disparities or produce other unintended consequences? How?**

Yes, Highly Capable services and tracking alters student learning experiences and the label itself has value and status in this district.

**3. Does the policy educate about the history and current realities regarding race, racism, special needs, ELL and the opportunity gap?**

No, the policy does not educate about the history and current realities regarding race, racism, special needs, ELL and the opportunity gap.

**4. What about this policy poses problems or barriers to more equitable outcomes? (mandated, political, emotional, financial, programmatic, managerial).**

1. Places HC eligible students on a tracked learning path- once on you receive transportation and additional services not available to all students.
2. Our BSD data is very concerning and due to significant differences in groups being represented; suggests that certain groups (Asian) are significantly more likely to be highly capable-make up 39.9% of the district, but 76.8 % of gifted student. This is a red flag to take a deeper look.

**5. What additional information could be added to strengthen the policy?**

A committee needs to be formed to strengthen this policy considering the following: is access to services a barrier (location, neighborhood) for participation, how are our students qualifying (through testing, teacher recommendations, etc. Are there data points here that we could analyze for equity?), are we advertising services in multiple languages, does student behavior impact identification?

**6. How does/could the policy promote opportunity or access for those who have been historically excluded? How can this policy benefit all students equitably?**

1. Expand how we identify students for gifted programs
2. Test at additional grade levels

\*remove part of our gifted services (we know by state law students need to be served) but there are other ways to do this in a less exclusive/restrictive environment

**7. Does the policy make provisions for accountability? What are they?**

Not to our knowledge.

**8. What community involvement is warranted by updates to this policy?**

A large cross section of the community must be involved if further discussions are to occur. Highly Capable is highly politicized policy for school boards.

**What recommendations do you make for this policy?**

A committee must be formed to research this topic further. This committee would:

1. Meet with our Highly Capable department

2. Research what other districts are doing to make HC services more equitable
3. Take a closer look at the ways in which our students are being identified- case studies would be of great interest.
4. Consider testing at additional grade levels like 3<sup>rd</sup>-5<sup>th</sup> grade. Testing for giftedness is not reliable in Kindergarten (source: Nurture Shock- The Search for Intelligent Life in Kindergarten).
5. Many students in our HC program study to pass CogAT and ITBS tests and there are test prep businesses. Who has access to these and does this avenue truly identify our gifted students? How many of our current eligible student had additional opportunities to prepare for tests? Who can purchase study guides and pay for private programs?

#### **What resources are needed to make changes?**

Time to research, access to more information and data.

#### **What are other next steps?**

Research- SPS removed a layer of gifted services and Miami Dade took steps to broaden how students are identified for gifted services.

***Miami unapologetically uses two standards to identify gifted students — one for low-income kids and English-learners, another for everyone else. As a result, its advanced-learning classrooms roughly mirror the district's overall makeup. Washington educators are taking note.***

<https://www.seattletimes.com/education-lab/the-push-to-find-more-gifted-kids-what-washington-can-learn-from-miamis-wins/>

## Policy 4130 - Parent Involvement

Reviewers: Alma Gonzalez and Maina Tran

<p><b>1. Which student groups (racial/ethnic, special needs, ELL) are most affected by this policy? What are the potential impacts on these groups?</b></p> <ol style="list-style-type: none"><li>1. Title 1 students and minority groups. The policy mainly focuses on Title I families.</li><li>2. While the policy itself does mention involving consultation of those affected parents, there are families who may not fall under Title I and are therefore overlooked or not reached due to language issues.</li></ol>
<p><b>2. Does this policy or procedure ignore or worsen existing disparities or produce other unintended consequences? How?</b></p> <ol style="list-style-type: none"><li>1. Yes, it ignores disparities and does not directly address the issues by not involving community feedback. Specifically, using third-party survey data that can add value to BSD's own data. BSD survey questions may not be asking the right questions. How were the questions formed and do they address the needs of the minority community or what BSD thinks is needed? The third-party data, specifically from Eastside Pathways and NISO, have data from survey questions developed by the community and distributed to same communities.</li><li>2. The main focus of the policy is on Title I. Only the introductory paragraph addresses the different groups.</li></ol>
<p><b>3. Does the policy educate about the history and current realities regarding race, racism, special needs, ELL and the opportunity gap?</b></p> <p>No.</p>
<p><b>4. What about this policy poses problems or barriers to more equitable outcomes? (mandated, political, emotional, financial, programmatic, managerial).</b></p> <ol style="list-style-type: none"><li>1. See #3. Even though the policy states that it involves the community in developing procedures, it does not. Need to follow through on execution.</li><li>2. The policy is not well communicated. Many families may not be able to read the policies and it should be provided in a few languages.</li><li>3. Families may not be clear on exact budget regarding family engagement activities.</li><li>4. BSD should also use professional translators. Even with good intentions, it can be seen as a disrespect of the languages when a translator tool is used which does not catch all the nuances of a language.</li></ol>
<p><b>5. What additional information could be added to strengthen the policy?</b></p> <p>Use survey data from credible third-party sources to compare with district data.</p>
<p><b>6. How does/could the policy promote opportunity or access for those who have been historically excluded? How can this policy benefit all students equitably?</b></p> <p>Provide resources to assist and encourage more (minority) families to take volunteer</p>

leadership roles. Financially, these parents may not have time to volunteer. If more parents of all backgrounds are more informed, more families can access the programs.

**7. Does the policy make provisions for accountability? What are they?**

1. No. There is no tracking of results (to our knowledge) or effectiveness of the program. (Talk to John Harrison, about family engagement, is there any data? How do they analyze data? What is entire process? How and who decides what and how to present the survey results?)
2. How to hold BSD accountable? To avoid conflict of interest, a suggestion is to use a third-party consultant to help address accountability. However, budget is not available (or not enough?) for family engagement.

**8. What community involvement is warranted by updates to this policy?**

1. Get feedback on families' experiences and what they think are issues and barriers to getting information/communication from the school.
2. Think of how to get Title I and minority parents to volunteer more in leadership positions.
3. Partner with other organizations who already have the network in place.

**What recommendations do you make for this policy?**

1. Revise to include focus on more than just Title I groups, include entire community. Change wording in intro paragraph so that it's not just the superintendent who will develop procedures (although it is stated in section A.)
2. Policy states that the "superintendent" will develop procedures... It should include a statement about using community feedback to help develop procedure, even though it is stated in section A but to include in beginning sentence.

**What resources are needed to make changes?**

- Allocate more money/budget
- Form official partnerships with community organizations.

**What are other next steps?**

- Use additional credible third-party data to supplement BSD's data.

## **Equity Policy**

**The EAG is unanimous in stating that BSD needs an Equity Policy to affirm each and every student, and that it should address predictability of student outcomes for students of color, English language learners and students receiving special education services. The EAG unanimously recommends the Board draft and approve such an Equity Policy.**

**Further, we recommend that the Equity Policy be an overarching governance policy that touches every part of the District.**

**We also recommend the Board assemble a diverse community of stakeholders to assist in drafting the Equity Policy.**

**We recommend the board draft and approve an Equity Policy that makes provisions for:**

1. Students of color, students with special needs and ELL students
2. Students living in poverty and with inequitable access, students experiencing homelessness, immigrant students, those new to the district, students with different academic abilities, and students with different citizenship status.
3. Recognizing and supporting the importance and needs of caregivers and families of students in all categories of #2 above.
4. The sense of belonging of all students.
5. Recognizing the impact that race has on our students' learning experiences, and the historic and current struggles our students of color experience.
6. Recognizing the historic and current reality of students with special needs and English Language learners.
7. Recruiting and retaining staff of color and providing supports so they can be successful in the District.
8. Recognizing that all staff should engage equally in the work of creating an equitable learning environment.
9. The Superintendent ensuring that long-term goals and aspirations with metrics and definitions are identified, articulated and published annually.
10. For annually assessing the adoption and implementation, with fidelity, of the policy.

## **EAG recommendation for Procedures to Implement Equity Policy**

Discussions and research conducted within the Equity Advisory Group have surfaced ways that school procedures can provide accountability, prevent inequities, and/or advance opportunity for students including:

1. Provide required, on-going and comprehensive training and professional development for staff around implicit bias, anti-discrimination, racial equity, and culturally responsive teaching.
2. Provide procedures for staff and volunteers to deal with racial tensions.
3. Review and improve hiring, recruitment, and retention of highly qualified staff of color, with attention to cultural and systems approaches that will aid teacher success.
4. Provide #1-3 above (training, professional development, procedures, hiring, recruiting and retaining staff) in order to support Special Education students.
5. Provide #1-3 above (training, professional development, procedures, hiring, recruiting and retaining staff) in order to support English language learners.
6. Focus on curriculum development and design that leverages and reflects the unique experiences and social, racial, cultural, linguistic, and familial backgrounds of BSD students.
7. Foster stronger partnerships with diverse groups of parents and stakeholders.
8. Provide equitable resource allocation based on student need.
9. Develop a robust measurement system that utilizes mixed methods (qualitative and quantitative data collection and analysis), over several years, to measure and track how students experience changes related to the new equity policy.
10. Funding and time allocations for staff to implement the policy in relevant ways.
11. Ensure all data reviewed at the District is disaggregated for specific racial and ethnic sub-groups.
12. Ensure equitable and equal access to all district programs that afford advantage, including but not limited to Advanced Learning, all district choice schools, and Advanced Placement and International Baccalaureate coursework.

We also recommend a contractual element for teachers to implement the procedures associated with the policy.

## **Rationale for an Equity Policy that Addresses Race, Special Needs Students and English Language Learners**

The District currently faces many challenges in how it serves the diversity of students who attend BSD schools. Inequities, in particular racial inequity, constitute the common denominator among those challenges. The District's ability to provide systems-wide guidance on more equitable policies, procedures, and practices to better serve the diversity of students who attend BSD schools represents a moral imperative for the Bellevue School District.

As noted in the Board's recent resolution reaffirming our commitment to "each and every student," the Board recognizes that not all of our students feel like they belong and not all of our students are learning and thriving in our schools. We also recognize that some of our policies, and the practices that stem from those policies, may be contributing to unintended inequities in students' experiences. Despite efforts to bridge the achievement gap of students of color, students receiving special education services, ELL students, and students living in poverty, these efforts have typically been programmatic and not systemic or cultural, and thus have been insufficient. District efforts to bridge these inequities demand bold and assertive action to engage in adaptive cultural change to shift hearts and minds of district staff and faculty. We believe that outcomes for *all* students will be lifted when we serve those most in need.

An Equity Policy at BSD should feature four specific areas:

1. Educational: This reflects the District's primary charge to provide for the educational needs of each student, including academic, social and emotional health and well-being.
2. Equity: This reflects the District's commitment to each and every student, especially those who have been historically marginalized including students of color, ELL students and students with disabilities.
3. Race: This reflects the District's commitment to redress historic and current inequities and biases that create feelings of fear, lack of belonging, and academic and psychological barriers amongst students of color, all of which contribute to suppressed academic achievement and performance.
4. Inclusion: This reflects the District's responsibility to serve all students and close academic, social and emotional gaps across racial, ethnic, cultural, linguistic, socio-economic, learning ability, gender identity and other groups. An Equity Policy should highlight:
  - a) Students and families who lack access due to limited English proficiency (LEP);
  - b) Students who experience cultural differences and misunderstandings in BSD schools and classrooms;



- c) Students who have been historically under-served including students of color, students receiving special education services, emerging bilingual students and students who live in poverty.

### **Equity for Race (grounds for including)**

Historic and current BSD data measuring student achievement, performance, and well-being demonstrate an obvious and predictable gap in outcomes and opportunities for students of color, most notably Black/African American, Hispanic/LatinX, and students from other racial groups.

Many factors contribute to a student's performance, including income level, country of origin, mobility and English proficiency. Even if we control for these factors, we still find the tendency for Black/African American and Hispanic/LatinX students to perform at lower levels than their White and Asian counterparts. In many cases, this gap is persistent, predictable, and thus unacceptable.

These gaps cut across multiple measures and data points collected by the District including:

- Graduation rates
- Discipline referrals
- Referrals for special education services
- Data of student belonging
- ACT/SAT performance
- SBA Passing rate
- D and F rates in secondary core content areas

Like many institutions, the District has a history of participating in and sustaining inequitable systems and practices that have perpetuated racial inequity and discrimination, even if this participation has been unintended. The District should acknowledge the history and existence of institutional racism, and its role within that system, which has systematically prohibited the educational and societal advancement of students of color.

Discussions and research conducted within the Equity Advisory Group have surfaced ways students of color experience school differently.

1. Racism and microaggressions which cause psychological barriers (fear, feeling limited) to kids of color, and damages all kids
2. Black/African American, and Hispanic/LatinX students have historically, and currently, performed at levels below those of White and Asian students on multiple standardized measures of student achievement and performance. The gap is persistent and predictable.
3. Native American, Pacific Islander and South East Asian students have historically, and currently, perform at levels below those of White and Asian students.
4. Black/African American, and Hispanic/LatinX students historically and currently have lower graduation rates than White and Asian counterparts.

5. Intersectionality (where many identities across categories combine for greater impact) accentuates a students' struggle, especially when the intersection includes income, race, disability and/or English language learning.
6. The Non-Discrimination policy protects students who identify in multiple groups including special ed, gender identify, religion, race, linguistic, etc., but has not been effective at addressing or alleviating systemic or individual bias and discrimination against students of color and students from other diverse groups.
7. Currently no policy addresses how individuals respond to race, how the system sustains bias, and how race impacts a student's opportunity and achievement.
8. The experiences of students of color, English Language Learners and students receiving special education services cannot be addressed in the same way; they have different challenges and needs and therefore require different approaches. The specific challenges of students and families of color exist within a larger, racially oppressive context. They are qualitatively and quantitatively different and thus, warrant a distinct policy focus.

We found no BSD policy that addresses racism, the behaviors we expect and how we hold people accountable for their actions. The District should create a policy that specifically lays out expectations in this area. The District should also review and revise current policies, systems, procedures, and practices to ensure these students' improved achievement and performance.

### **Equity for Inclusion (grounds for including)**

The district should also recognize its history – even if unintended – of sustaining incomplete and insufficient systems of support and accountability, and practices to elevate/educate emerging bilingual students, students with disabilities, LGBTQ students, and students experiencing homelessness and students living in poverty. More needs to be done to better support positive outcomes for these students. Each student group listed above faces unique challenges in district classrooms and schools.

These gaps cut across multiple measures and data points collected by the District including:

- Graduation rates
- Discipline referrals
- Data of student belonging and comfort (panorama)
- ACT/SAT performance
- SBA Passing rate
- D and F rates in secondary core content areas

Discussions and research conducted within the Equity Advisory Group have surfaced ways different student groups experience school differently including:

1. Many factors contribute to student performance (mobility, country of origin, poverty).

2. Students receiving special education services struggle to achieve at levels compared to General Ed students.
3. Students receiving ELL services consistently perform lower compared to students in General Ed.
4. There exists a patchwork of systems, policies, procedures, and supports to serve students with disabilities and English Language Learners, but they are incomplete and insufficient to bridge the gap in achievement and performance these students face.
5. Poverty remains a significant barrier to student success and can significantly impact students' abilities to come to school ready to learn. Research shows that a student's socio-economic status is one of the strongest predictors of student achievement on standardized measures.

## Defining Terms: Diversity, Inclusion, Equity (and Racial Equity), and Equality

The following document was provided by Paul Sutton, EAG member and Assistant Professor of Education at Pacific Lutheran University. The EAG reviewed, discussed and edited the original to agree on terms for EAG use.

**Diversity:** A belief in diversity is an acknowledgment of the value of having a multitude of beliefs, perspectives, and ideologies present within social groups (e.g. neighborhoods, community and professional organizations, etc.) to deepen cross-cultural understanding and learning to benefit individuals and the community as a whole (Banks et al., 2007). In education, calls for greater diversity, both in schools, programs and within the curriculum, stem from the belief that 1) different kinds of students have much to gain from learning from each other and 2) from learning from a diversity of teachers and teaching styles. Such interaction teaches students essential democratic skills (Parker, 2003) and broadens their perspective, making them more aware of and responsible for being culturally and racially literate over time (Banks, 1993; Guinier, 2004).

**Inclusion:** Inclusion refers to the policies and procedures that organizations make to intentionally include a diversity of people in any social or organizational context. In many ways, inclusion is the enactment of a belief in the value of diversity (Banks, 1993). In education, calls for greater inclusion can refer to the kinds of people invited to meetings (e.g. a diversity of parents, students, various community stakeholders) and/or the access guaranteed to students into different kinds of coursework (e.g. students from historically marginalized communities or students with disabilities or ELL students encouraged to enroll in mainstream or advanced coursework). Research has repeatedly shown that thoughtful inclusion of a diversity of students within schools, programs, and classrooms, benefits students socially and academically (Au & Kawakami, 1994; Banks et al., 2007; Sahlberg, 2010).

**Equality:** Equality refers to the belief that all students should be afforded the same treatment and access to educational resources and opportunities regardless of racial, ethnic, linguistic, socio-economic status or learning ability. Underpinning the argument for more equality in the educational system is a belief that a central purpose of public schools is to ensure greater democratic participation and social mobility for all its citizens (Labaree, 1997). The relevant research strongly suggests that unequal access to resources, whether it be high quality teachers, after school programs, or highly rigorous coursework, to name a few, negatively impacts students' academic performance and achievement as well as their social and emotional well-being (Darling-Hammond, 2010). One example of policy that aimed to create more equality in the system was the Bellevue School District's policy to open access to and enrollment of advanced coursework (e.g. the Advanced Placement and International Baccalaureate programs) to all students.

**Equity:** In educational research, equity is defined as providing students with differentiated levels of support and resources in order to provide them with an equal opportunity to succeed in school. A focus on equity is warranted by research (Lareau, 2011) that demonstrates that because the public education system was largely developed by White, middle class men, schools have come to reflect the tacit and explicit norms and rules of White, middle class culture (Watkins, 2001). Students who don't come from those backgrounds can struggle to learn and adapt to the tacit norms and rules of schools and thus, may struggle academically. Equity-focused policy describes the ways in which educators accommodate children who don't come from middle to upper class backgrounds, as well as students with disabilities (SWD) and students who qualify for English Language Learner (ELL)

services, in an attempt to help them be as successful as students who don't have to overcome those obstacles.

In educational research, racial equity is a concept borne out of a body of research (Kozol, 1995; Darling-Hammond, 2010) that reflects the field's understanding that students of color can experience compounded stress and anxiety when the implicit or explicit racism they experience outside of school is unknowingly or knowingly replicated by teachers and administrators in schools (Pollock, 2017). Educators' mistreatment of students of color is well documented (see attached reference list) and can stem from individual's explicit or implicit bias and racism, such as racial microaggressions (Pollock, 2017), *and* the largely invisible structural and systemic factors that impede and limit how successful children of color can be. Policies aimed at addressing racial inequity require districts and schools to address both the practices of individuals within the system, such as teachers, staff, and administrators, and the institutional practices that empower and protect the biased actions of individuals against students and families of color.

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## Framework for Selecting Which Policies to Review

This framework was created by the EAG and used to assess most of the 2000, 3000 and 4000-series policies, yielding 52 total policies that the EAG feels need to be reviewed. The group read about the policies and prioritized the ones most needing revision first (9).

Policy Name/Number	Y/N
1. Can this policy be changed (i.e., not locked into legal requirement?)	
2. Does the policy impact the student experience?	
3. Does the policy relate to communication with students or parents?	
4. Does the policy relate to teaching and learning?	
5. Does the policy relate to recruitment and retention of teachers?	
6. Does the policy address physical or mental safety?	
7. Does the policy relate to family engagement?	
8. Does the policy relate to access, fees or eligibility?	
9. Does the policy have the potential to disrupt the students' learning experience?	
<b>More than five YES responses = Put the policy on the list for revision</b>	

## Equity Lens for Reviewing Policies

This lens was created by the EAG and used to assess each of the nine policies selected. The lens was a combination of the Racial Equity Tool published by the Puget Sound Educational Service District (PSESD) and the Equity Lens used by the Portland, OR school district.

Policy # and Title: (Policy)

Reviewers: (Names)

1. Which student groups (racial/ethnic, special needs, ELL) are most affected by this policy? What are the potential impacts on these groups?
2. Does this policy or procedure ignore or worsen existing disparities or produce other unintended consequences? How?
3. Does the policy educate about the history and current realities regarding race, racism, special needs, ELL and the opportunity gap?
4. What about this policy poses problems or barriers to more equitable outcomes? (mandated, political, emotional, financial, programmatic, managerial).
5. What additional information could be added to strengthen the policy?
6. How does/could the policy promote opportunity or access for those who have been historically excluded? How can this policy benefit all students equitably?
7. Does the policy make provisions for accountability? What are they?
8. What community involvement is warranted by updates to this policy?

After conducting the analysis:

1. What recommendations do you make for this policy?
2. What resources are needed to make changes?
3. What are other next steps?



## **Districts Researched**

The sub-committee for Equity Policy Research looked at 10 school districts from every region in the country, including local school districts. Inclusion criteria comprised districts that had formally adopted equity policies. The group started with district recommendations from BSD Superintendent Dr. Duran and Shomari Jones, BSD Director of Equity and Graduation Success.

The group likely would have performed a more thorough search if they had more time both in terms of deadlines and in terms expendable hours outside the workday. This committee of three spent between 25-30 hours outside the regular EAG meetings. Paul Sutton, Monica Webster and Huaxia Zhao provided the research.

Districts Researched:

- 1) \*Dallas Independent School District, TX
- 2) \*Minneapolis Public Schools, MN
- 3) Baltimore School District, MD
- 4) \*Chesterfield County School District, VA
- 5) North Clackamas Schools, OR
- 6) St. Paul Public Schools, MN
- 7) Irvine School District, CA
- 8) Seattle Public Schools, WA
- 9) Auburn Public Schools, WA
- 10) Issaquah School District, WA

The districts with the asterisk (\*) were looked into deeply, including calls to district staff.

## **Policies Reviewed by BSD Equity Advisory Team**

**November 15, 2018**

- 1. 3110 Qualifications of Attendance and Placement**  
Describes mandatory school attendance, how students qualify for admission and the District's right to place students.
- 2. 3114 Part-Time Students – Private, Home of Off-Campus**  
Describes the right to ancillary services for private school and home-schooled students. The BSD does not permit part-time enrollment.
- 3. 3115 Homeless Students – Rights and Services**  
Describes the rights that students experiencing homelessness are entitled to including transportation to and from the school of origin, fee waivers etc.
- 4. 3116 Students in Foster Care**  
Describes the rights that students in foster care entitled to. Very similar to students experiencing homelessness with the exception of transportation.
- 5. 3120 Enrollment – Resident Students**  
Describes enrollment rights and processes. For example, proof of residency, children of staff, district-determined placement, open enrollment, choice school enrollment etc.
- 6. 3122 Excused and Unexcused Absences**  
Identifies reasons to excuse absences and rights of families and responsibilities of schools in reporting absences and trancies.
- 7. 3123 Withdrawal Prior to Graduation**  
Describes the state requirement that no student under 16 may withdraw without parent approval or legal emancipation from parents.
- 8. 3124 Removal/Release During School Hours**  
States that students may not be removed during the school day unless the parent can be reached prior to the end of the school day.
- 9. 3126 Child Custody**  
Outlines the District's assumption that the person(s) who enroll students are the residency parents and describes the District's obligation to communicate with residency parents and the parent's responsibility to inform the district if anything changes (court documents etc.)
- 10. 3140 Release of Resident Students**  
Identifies the reasons a resident district would release enrollment of a resident student to enroll in another district.
- 11. 3200 Rights and Responsibilities**  
Describes student rights and responsibilities related to student conduct. The most important is the right to be informed on annual basis.
- 12. 3205 Prohibition of Sexual Harassment – Students**  
Defines sexual harassment and the responsibilities for staff in reporting and the District in investigating allegations in accordance with federal Title IX legislation.
- 13. 3207 Prohibition of Harassment, Intimidation and Bullying**  
Defines harassment, intimidation and bullying and the responsibilities for staff in reporting and the District in investigating allegations in accordance. Defines both malicious and discriminatory harassment and requirement to investigate allegations of discriminatory harassment under Policy 3210 as well as 3205.
- 14. 3210 Nondiscrimination**

Defines discrimination as it pertains to “protected classes” of students and the District’s responsibility to investigate allegations of discrimination. Procedure 3210.1P addresses the rights of students and the responsibility of the District to transgender and gender non-conforming students.

**15. 3220 Freedom of Expression**

Describes how the right to freedom of speech and expression is protected in the educational setting particularly as it relates to student publications and distribution of those publications.

**16. 3223 Freedom of Assembly**

Explains the rights of students to meet to discuss and resolve matters that affect them.

**17. 3224 Student Dress**

States the District’s position of not regulating student dress unless it poses a health, safety, property risk of disrupts the educational process.

**18. 3240 Student Conduct**

Describes the expectations of students to conform to reasonable standards of acceptable behavior: respect the rights, person and property of others; preserve the degree of order necessary for a positive climate for learning; and submit to the authority of staff and respond accordingly.

**19. 3241 Classroom Management, Corrective Action and/or Interventions**

Outlines the District’s philosophy of dealing with student misconduct, describes what constitutes misconduct, describes forms of corrective action and/or interventions available as well as describing appeal processes.

**20. 3421 Child Abuse, Neglect and Exploitation Prevention**

Defines abuse, neglect and exploitation and certificated staff’s duties as mandatory reporters.

**21. 3515 Student Incentives**

The board allows awarding of incentives to recognize student academic, social, leadership and athletic achievements.

**22. 3520 Student Fees, Fines or Charges**

States the District’s obligation to provide an educational program for the students as free of cost as possible. It describes the District’s ability to charge for the use of supplementary supplies or materials. Schools establish appropriate fees and fee schedules are reported to the Board annually.

**23. 2020 - Curriculum Development and Adoption of Instructional Materials**

Outlines the process of curriculum adoption and the selection and adoption of instructional materials.

**24. 2021 - Library Media Centers**

Describes school libraries as an extension of the classroom and provides for procedures to determine the selection and challenge of library materials.

**25. 2022 - Electronic Resources**

States the District’s obligation to teach educational technology standards and to teach digital safety and citizenship.

**26. 2108 – Learning Assistance Programs (LAP)**

Describes the district’s duty to conduct a needs assessment and develop a plan to spend LAP funds. Focused on ELA and math, underrepresented students and requires identification of the activities the program will implement.

**27. 2110 – Transitional Bilingual Instructional Program (ELL)**

Defines transitional bilingual instruction and the District's obligation to serve students for whom English is not the primary language. Focuses on the use of two languages to develop competency in English, yet, calls for testing in English.

**28. 2140 – Guidance Counseling**

Defines counseling as a program focuses on guidance, student planning, responsive services and systems support.

**29. 2145 – Suicide Prevention**

Calls for procedures to train staff, identify risk factors, interventions, refer for services, and follow-up on suicides and suicide attempts.

**30. 2150 – Co-Curricular Program**

Recognizes the value of learning experiences outside of the curriculum and outside of the school day. Typically approved by school ASBs and are curriculum related.

**31. 2151 – Interscholastic Activities**

Describes the role of interscholastic activities and athletics both sanctioned by the WIAA and locally approved activities. Requires an annual review of each program and includes a complaints process.

**32. 2153 -Non-Curriculum Related Student Groups**

Describes the right of students to form students groups (subject to the approval of the principal) pursuant to the Equal Access Act to create "limited open forum."

**33. 2161 – Specoial Education and Related Services**

Describes the District's commitment to full compliance with state and federal requirements related to special education. Codifies the legal standard of FAPE "free and appropriate public education," (LRE) "least restrictive environment", procedural safeguards and students receiving services in private schools, consistent with the Individuals with Disabilities in Education Act (IDEA).

**34. 2162 – Education of Students with Disabilities under Section 504**

The District is required to ensure that students who are disabled under the definition of Section 504 of the Rehabilitation Act (a physical or mental impairment that substantially limits one or more major life activities) are accommodated for their impairment.

**35. 2170 - Career and Technical Education**

States the District will provide a program of career and technical opportunities to prepare students for post-secondary options and requires the establishment of CTE Advisory Committee(s).

**36. 2190 – Highly Capable Services**

**37. On-Line Courses**

**38. 2255 - Alternative Learning Experience Program**

The Board authorizes the creation of alternative learning experience (ALE) courses: On-line, parent-partnership, contract-based courses. Currently no ALE courses are offered in the BSD.

**39. 2320 – Field Trips and Excursions**

Describes the value of field trips and defines field trips as school sponsored and states that out of state and overnight trips must be approved by the Board.

**40. 2331 – Academic Freedom and Controversial Issues**

Describes academic freedom designed to expose learners to all ideas and how controversial topics must be handled. Basically, the District states that controversial topics must not be avoided but requires that all sides of the issue are presented and that teachers not present their position as the only acceptable position.

**41. 2336 – State/Federal Required Observances**

Principals are responsible for the preparation and presentation of educational activities of observance for Veteran's Day, Constitution Day, Temperance and Good Citizenship Day, and Disability History Month.

**42. 2340 – Religious-Related Activities and Practices**

The board accepts the declaration of the State Board of Education that "all students possess the constitutional right to the free exercise of religion and to have their schools free from sectarian control or influence." The board establishes guidelines to preserve the constitutional rights of students.

**43. 2409 - Credit for Competency/Proficiency**

Directs the superintendent to develop procedures for awarding credits to students based on demonstrated proficiency. The procedure would address awarding credits for proficiency in world languages and other subjects as course materials, proficiency assessments, and district resources allow.

**44. 2420- Grading and Progress Reporting**

States that "grades will be determined for each content area or course. Grades will be determined by teachers and will reflect the student's achievement of grade-level or course-level learning standards including intellectual, arts, physical, and social skills areas, as applicable. Attendance will be reported separately."

**45. 2421- Grade Level promotion and Retention**

Upon completion of a year of study at a specific grade level, he/she will be promoted to the next grade. Factors taken into consideration are the student's academic achievement; physical, social and emotional maturity, and age. Retention or double promotion of a student in grades kindergarten through eight shall in all cases result only from a thorough study of all these factors.

**46. 6102 – Fundraising Activities**

The Board authorizes fundraising activities that: (1) promote K-12 education; (2) provide educational experiences for students, and/or (3) address local funding obligations that support the educational mission of the district; (4) and/or promote the effective, efficient, or safe management and operation of the district. It does not cover fundraising by PTAs or ASBs.

**47. 6114 – Donations**

The District accepts donations from individuals and organizations to assist in the education of students. Donations may be used for purposes consistent with federal and state laws/regulations and District policies/procedures. Specific authorization must be obtained from prior to the receipt of any donation. The District does not accept donations for the direct purpose of hiring or employing additional certificated staff.

**48. 6600 – Transportation**

The District provides transportation to and from school for students whose residence is beyond one mile from the school to which the student is assigned. The District may also provide transportation for students whose walking route to school is hazardous; whose disability prevents him/her from walking or providing for his/her own welfare while walking; or has another compelling and legally sufficient reason to receive transportation services.

**49. 4130 – Parental Involvement**

The District encourages and supports family engagement at home, in schools and communities, and in school governance. The District recognizes the diversity of family structures, circumstances and cultural backgrounds and respects families as important

decision makers for their children's education. The policy also provides guidance for parent involvement in Title I schools.

**50. 4220 – Complaints Concerning Staff or Programs**

The policy calls for procedures to handle complaints concerning staff or programs and states that complaints about specific personnel will not be heard in open session at Board meetings.

**51. 4237 – Contests, Advertising and Promotions**

Any club, association or other organization must have prior approval for student participation in any contest, advertising campaign or promotion. Approval may be given based on the following criteria:

- The objectives of the contest, campaign, or promotion are consistent with the district's goals and policies;
- The proposed activity will have educational value to the participants and be free of objectionable promotion of the name, product or special interest of the sponsoring group; and
- Participation by a student will not interfere with his/her program of curricular or cocurricular activities.

**52. 4310 – Relations with Law Enforcement, CPS and County Health**

The District strives to develop and maintain cooperative working relationships with law enforcement and other government agencies. The policy dictates that the superintendent will establish procedures to address the handling of child abuse and neglect allegations and cases, arrests by law enforcement officers on school premises, and the process for investigating possible criminal activity involving students etc.

# Learning Resources about Racial and Special Education Inequities

Assembled for and by the Bellevue School District Equity Advisory Group

1. **Transforming Inclusive Education** Shelley Moore of The University of British Columbia, 3-min Inclusive Education Video: <https://www.youtube.com/watch?v=RYtUIU8MjIY>
2. **“Debunking Myths about Race”** White Fragility author Robin di Angelo in 4-min video: <https://www.bing.com/videos/search?q=white+fragility+author+video&&view=detail&mid=196E8C08BFA5B6F8D86A196E8C08BFA5B6F8D86A&&FORM=VRDGAR>
3. **Bellevue School District Equity** 4-min video  
<https://app.frame.io/presentations/b5811055-891e-41c1-bf68-90e88d9ccf7c>
4. **“Under Our Skin” from Seattle Times**  
<https://projects.seattletimes.com/2016/under-our-skin/#>
5. **“Microaggressions in Everyday Life”** Professor Derald Wing Sue at  
<https://www.youtube.com/watch?v=xAlFGBlEsBQ>
6. **How do you Respond to Microaggressions -**  
<https://www.youtube.com/watch?v=C3LFB4mJODI> 4.5 min video of individual voices by Pacific Lutheran University LISTEN project (note some of the negative comments under the video)
7. **Dr. Jeff Duncan-Andrade.** A powerful video where he explains the difference between education and schooling, 9.5 min. <https://www.youtube.com/watch?v=QJ13fPXgG0c>  
And, “The Game is Rigged” 5 min <https://vimeo.com/234442724>
8. **“There is no Hierarchy of Oppressions”** Audre Lorde’s 3.5-min essay speaks poignantly of intersectionality: <https://www.youtube.com/watch?v=i1pNsLsHsfs>
9. **Intersection of black and disabled students and discipline in schools.** 3 min clip with animated drawing and music that lays out the data regarding black students and disabled students - <https://www.youtube.com/watch?v=mLzvlY2CLiY>
10. ***Leading for Equity: The Pursuit of Excellence in the Montgomery County Public Schools*** by Stacey M. Childress and Denis P. Doyle.
11. **Oregon school district integrates all students with disabilities -** May 2018. 7 min video. <https://www.king5.com/video/news/local/oregon-school-district-integrates-all-students-with-disabilities/281-8138556> “Washington has one of the worst track records in the county of segregating kids in special education away from general education classrooms –

Only 54% spend a majority of their day with general ed. Only two other schools have worse integration rates.”

**12. Special Ed Failures:** a series of reports from the King 5 reporter:

<https://www.king5.com/article/news/local/back-of-the-class-an-investigation-into-was-special-ed-failures/281-570008762>

**13. Daniel Habib is a disability advocate and movie producer.** 7-min video on his experience. The BSNPTA will be screening his movie "Intelligent Lives" in January.

<https://www.youtube.com/watch?v=NkjCgAlBFj4>

**14. A 17-minute TEDx talk with Daniel Habib** “Including Samuel”. Photojournalist Dan Habib didn't give much thought to disability — until his son Samuel was born with cerebral palsy. In this emotional talk, the disability-rights advocate explains his family's fight to ensure an inclusive education for Samuel, and how inclusion benefits all of us.

<https://www.youtube.com/watch?v=izkN5vLbnw8>

**15. Reimagining Disability & Inclusive Education,** Jan Wilson, TEDx University of Tulsa – 16 min

[https://www.youtube.com/watch?v=CtRY\\_1mZWWg&fbclid=IwAR1qpnE-DMJzLfO\\_q1yowx1QRQewQa1lGujtPNMnzjwgQUE1LsMtj12Bdy8&app=desktop](https://www.youtube.com/watch?v=CtRY_1mZWWg&fbclid=IwAR1qpnE-DMJzLfO_q1yowx1QRQewQa1lGujtPNMnzjwgQUE1LsMtj12Bdy8&app=desktop)

**16. Five Facts about the pipeline to prison for students with disabilities.** 1 min

<https://www.bing.com/videos/search?q=disability+pipeline+to+prison+video&docid=608050587395166054&mid=5F52C48D96582C23E5355F52C48D96582C23E535&view=detail&FORM=VIRE>



## Roster

The Superintendent's Equity Advisory Group was selected to engage a representative breadth of voices from among our community, especially from groups that frequently experience significant barriers.

This group put in an estimated 750 total hours from October 2018 – February 2019. This included 10 meetings of 2-3 hours, research and sub-group meetings.

Attendance was extremely high, with an average 83% attendance rate across all meetings. Absences were due to illness or, in very few circumstances, previously scheduled commitments.

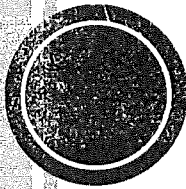
NAME	ROLE
Huaxia Zhao	at large parent member
Keri Dutton	at large parent member
Pia Dey	at large parent member
Jennifer Hodges	at large parent member
Paul Sutton	External Expert, PLU
Miriam Lara	NISO (Latino Parent Group)
Alma Gonzalez	NISO (Latino Parent Group)
Susie Pietz	Special Needs PTA
Monica Webster	PABS (Parent Alliance of Black Scholars)
Haruka Kojima	AAPF (Asian Pacific Islander Alliance)
Maina Train	PTSA Council
Lynn Juniel	Bellevue Schools Foundation
Stephanie Cherrington	Eastside Pathways
Chhoun Mey	School Admin - Elementary
LeAnn Tuupo	School Admin - Middle
Myra Arnone	School Admin - High
Jill Rock	Educator – Middle/Special Ed
Ana Garcia	Educator Bilingual program
Maria Ocampo	Educator - Middle
Ivan Duran	Group Advisor
Shomari Jones	Group Advisor
John Harrison	Group Advisor
Pat Hughes	Group Facilitator, Trillium Leadership





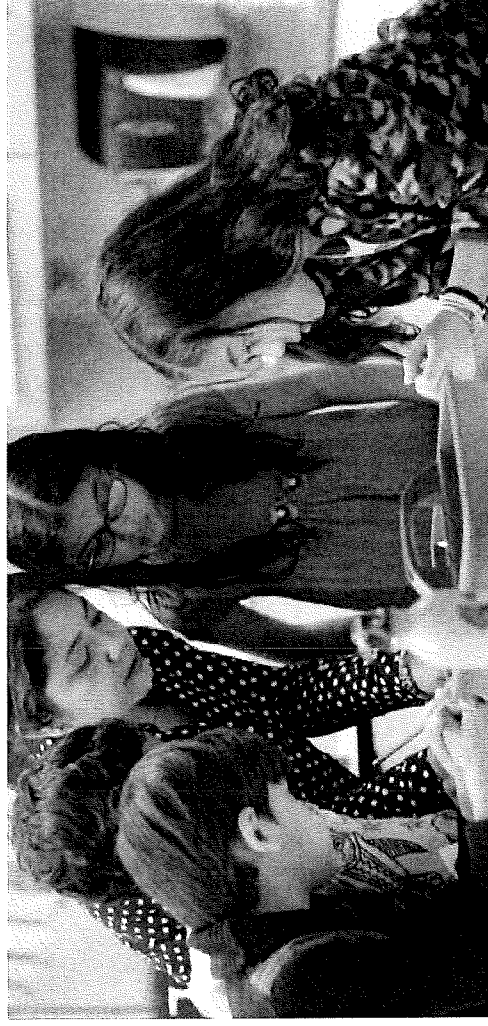
# EQUITY ADVISORY GROUP

October 2018 – February 2019



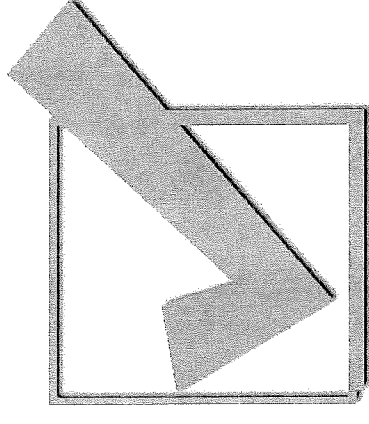
# PURPOSE

Help the Bellevue School District engage a diverse breadth of voices to better understand the unique and shared student needs, and to assure those needs are being addressed in policy and day-to-day interactions.



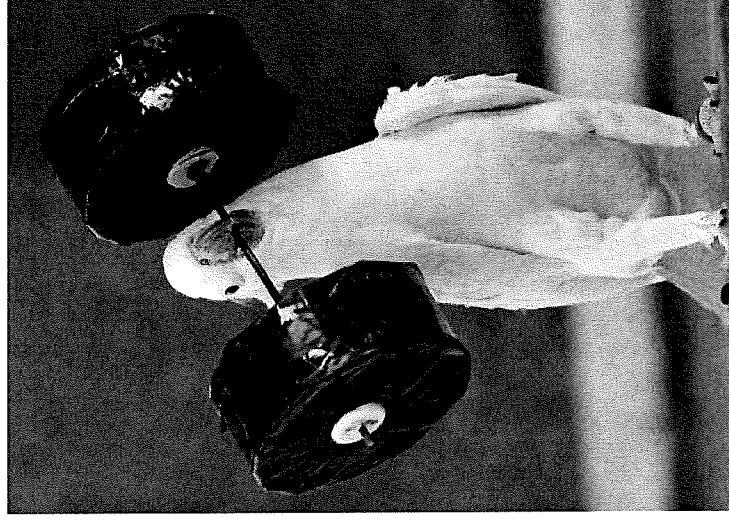
# EQUITY ADVISORY GROUP SCOPE OF WORK

1. Create a Framework to identify policies needing revision (*done*)
2. Identify current policies to be reviewed (52 > top 9) (*done*)
3. Research and identify leading equity practices at other districts & organizations (*done*)
4. Recommend new policies and/or revisions to existing policies to affirm every student (*done*)
5. Recommend how District academic and organizational services and programs may be better aligned, enhanced or added to better meet the needs of all students (*done*)



# THIS WAS A BIG LIFT

- 10 meetings over five months
- 19 committee members
- Over 750 person hours to date (estimate)
- 83% average attendance
- 10 Districts researched
- Two snowstorms



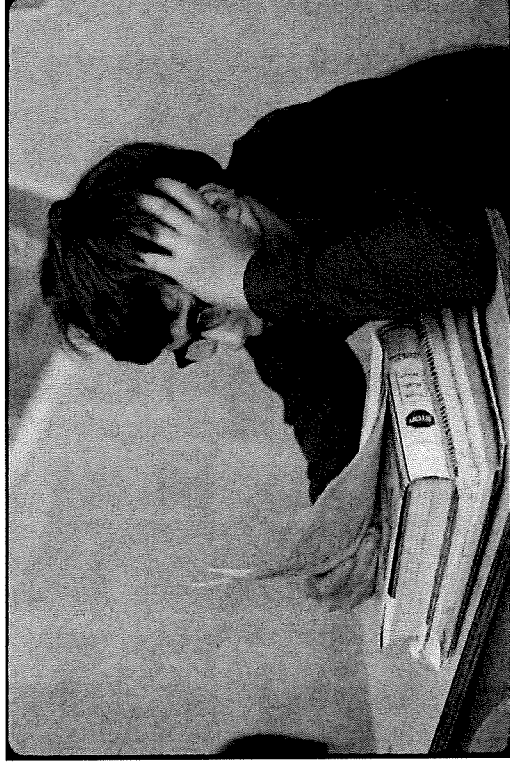
# **POLICY REVIEW APPROACH**

1. Overview of 2000, 3000 and 4000-series policies by John Harrison
2. Reading and review of all policies
3. EAG studied these policies more closely in small groups
4. Create and use Framework to assess all policies
5. Framework process yielded 52 policies needing review or revision
6. Additional reading on the 52 policies
7. Dot voting to identify those needing revision most urgently = 9
8. Groups signed up to work on these policies using Equity Tool



# **POLICIES MOST IN NEED OF REVIEW / REVISION**

1. 2020: Curriculum Development
2. 2110: Transitional Bilingual Instruction
3. 2161: Special Education
4. 2190: Highly Capable Program
5. 3210: Non-Discrimination
6. 3241: Classroom Management, Corrective Actions Or Interventions
7. 4130: Parent Involvement
8. 4220: Complaints Regarding Staff or Programs
9. 6114: Donations was originally included but set aside since it's already in review)





# EQUITY LENS TO REVIEW POLICIES

1. Which student groups (racial/ethnic, special needs, ELL) are most affected by this policy? What are the potential impacts on these groups?
2. Does this policy or procedure ignore or worsen existing disparities or produce other unintended consequences? How?
3. Does the policy educate about the history and current realities regarding race, racism, special needs, ELL and the opportunity gap?
4. What about this policy poses problems or barriers to more equitable outcomes? (mandated, political, emotional, financial, programmatic, managerial)
5. What additional information could be added to strengthen the policy?
6. How does/could the policy promote opportunity or access for those who have been historically excluded? How can this policy benefit all students equitably?
7. Does the policy make provisions for accountability? What are they?
8. What community involvement is warranted by updates to this policy?



# POLICY 2020 CURRICULUM DEVELOPMENT AND ADOPTION OF INSTRUCTIONAL MATERIALS

## Key Challenges:

1. Global impact of curriculum mandates need for curriculum to be relevant and reflective of our student populations
2. Inequitable approach for different content areas towards adoption of culturally responsive (CR) curricula
3. Adoption process is lengthy and committee does not explicitly include multiple voices
4. Culturally-centered adopted curriculum may not be implemented with fidelity - up to teacher discretion to deliver and implement

## Key Recommendations:

1. Search for innovative curriculum that is holistic, culturally responsive
2. All curricular content areas in the process of adoption should use the CR lens
3. Intentional selection of members in adoption committee to reflect CR practices
4. Partnership with BEA around teacher implementation in a systemic manner
5. Accountability, language updates in P2020 to introduce, strengthen, reinforce more inclusive processes in adoption

Reviewed by: Lynn Juniel, LeAnn Tuupo, Myra Arnone



# POLICY 2110 - TRANSITIONAL BILINGUAL INSTRUCTION

## Key Challenges:

1. The Policy is not updated with languages in OSPI.
2. The District does not effectively communicate with parents of English language learners.
3. The District does not provide continuous improvement and evaluation of the Program.
4. The Procedure is not updated with the current name of the Test.

## Key Recommendations:

1. Rename the policy to “Programs for Multilingual Learners” with updated languages.
2. Update the procedure with the current name of the Test.
3. BSD should adopt its own policy for English language learners
4. BSD should have an accountable and effective communication plan with parents of English language learners.
5. Evaluate the Program by the year end and reflect/incorporate the results for next year’s Program.
6. Collaborate with community’s partners to support English language learners.

Reviewed by: Alma Gonzalez, Miriam Lara,  
Haruka Kojima



# POLICY 2161 SPECIAL EDUCATION AND RELATED SERVICES

## Key Challenges:

1. Implementation of procedures may lead to unintended consequences.
2. Does not address the history and current realities around special needs, race and opportunity gap.
3. Does not address political, emotional, or financial barriers to more equitable outcomes.
4. “Related services” are in the title of the policy, however not addressed in the policy.
5. The order of titles and bulleted items are not in sequential order of the special education process.

Reviewed by: Jill Rock, Suzie Pietz

## Key Recommendations:

1. Delve further into the procedures of the policy to remove/clarify unintended consequences.
2. Add this information and/or have a disclaimer to refer to the overall Equity Policy for history and current realities.
3. Add “political, emotional, or financial barriers to more equitable outcomes” to the list of items addressed in the procedures, and provide further information within the procedures.
4. Related services need to be addressed such as OT/PT/SLP.
5. Review and adjust the order of bullets (ex. FAPE should be addressed before mediation).



# POLICY 2190 ADVANCED LEARNING

## Key Challenges:

1. Data illuminates disproportionality and absence or small traces of many subgroups including: EL, SPED, African American and Latino. Specific data is outlined in the report.
2. Applying an equity lens on AL will evoke concern from communities currently benefitting from current practice.
3. AL is a highly politicized topic.
4. AL may be missing groups of students due to the identification process; determining a new approach will be a challenge.

Reviewed by: Jennifer Hodges & Keri Dutton

## Key Recommendations:

1. Form a committee to continue studying equity as it relates to Advanced Learning; meet with the department and research other districts re: ensuring equitable access to gifted services.
2. Consider adding additional grades for site based testing (5th grade) & consider that Kindergarten and First grade are not ideal for identifying giftedness.
3. Analyze how we identify students; do the measures ensure equitable access? How are students entering AL program? Who has access to prep programs?
4. Consider expanding how we identify students for AL services and engage communities like SPED and EL to remove barriers to access.
5. Engage all stakeholders to ensure location of AL and transportation is not a barrier to access.



# POLICY 3210 NON DISCRIMINATION

## Key Challenges:

1. Specific subgroups are not explicitly called out in the policy.
2. Does not educate about the history and current realities around, race, racism, ELL, special needs and the opportunity gaps.
3. The procedural section on training lacks a clear outline of who, when, what and how of the Superintendent's training responsibility will be executed or what outcome will be achieved.
4. The scope of the work for the Accountability Manager is vague.

## Key Recommendations:

1. Include subgroups: students with disparate socio-economic status, different academic abilities, Multilingual (ELL), and different Citizenship status.
2. Include a reference of historical realities of discrimination to strengthen imperatives and/or reference the overarching Equity Policy to highlight it.
3. Provide education and training to staff, students and parents with specified frequency, and means of communication to on discriminations, accessible in multiple languages.
4. Clearly delineate the Scope of work for the Accountability Manager or the Director of Employee Relations per the procedure outlined.

Reviewed by: Haruka Kojima, Jill Rock, Pia Dey

# **POLICY 3241 CLASSROOM MANAGEMENT, CORRECTIVE ACTIONS AND OR/INTERVENTIONS**

## **Key Challenges:**

1. Too long
2. Vocabulary complicated
3. Hard to navigate
4. Vague consequences
5. Inaccessible

## **Key Recommendations:**

1. Could be simplified
2. Easier vocabulary
3. Set up clear steps to follow
4. Specific consequences
5. Accessible in other languages

Reviewed by: Maria Ocampo, Ana Garcia



# POLICY 4130 PARENT INVOLVEMENT

## **Key Challenges:**

1. Need to include other underrepresented groups such as ELL and special needs.
2. Insufficient funding to support policy.
3. Providing translation of outreach materials in several languages.
4. Insufficient data to assess effectiveness of policy.

## **Key Recommendations:**

1. Add language in policy to include other underrepresented groups.
2. Evaluate current budget for family engagement activities to determine if additional funding is needed.
3. Use people translators instead of software to translate outreach materials.
4. Conduct family surveys in addition to student surveys.

Reviewed by: Alma Gonzalez and Maina Tran





# 4220 COMPLAINTS

## Key Challenges:

1. Policy is not reader-friendly for those unfamiliar with policy, creating a problematic barrier to equitably reaching all families.
2. Language is off-putting and intimidating to families/groups unfamiliar with or new to navigating the complaint process.
3. Perpetuates a 'non-English' deficit view and is divisive.
4. Disproportionally impacts students of color, students with special needs, students who are ELL and students from non-affluent backgrounds.
5. Includes ambiguous terminology.

## Key Recommendations:

1. Create a clearly written step-by-step process similar to that of the Baltimore City School District, as well as definitions of key language.
2. Add language stating BSD's commitment to offering the support of a point person to help with informal and formal processes of filing a complaint.
3. Include language that clearly states that complaints are evidence-based as seen in Minneapolis School District policy.
4. Invite community input from those who have navigated or attempted to navigate the complaint process, with a focus on our more underserved communities.

Reviewed by: Ana Garcia, Lynn Juniel and Maria Ocampo



# NEW: LANGUAGE ACCESS POLICY

**The EAG recognized that BSD lacks a policy that ensures .....**

- Effective, free from cost, two-way communication for families with limited English proficiency (LEP)
- Identification of LEP families
- The provision of oral interpretation for materials or information about District programs, services, and activities
- The provision of written translation for “vital” documents families that constitutes at least 5 percent of the District’s total parent population or 1000 persons, whichever is less
- Guidance for staff

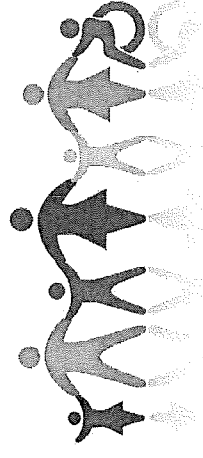
**The EAG recommends that the Language Access Policy require an accompanying procedure that.....**

- Provides definitions of terms
- Describes the process to identify LEP families
- Clear guidelines and expectations for oral interpretation and written translation for materials and information on District programs, services and activities
- A list of “vital” documents (updated annually)
- Clear expectations for staff training

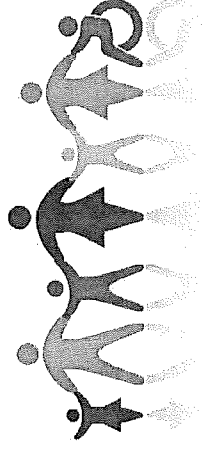


# EQUITY POLICY TO AFFIRM EACH AND EVERY STUDENT

- The EAG is unanimous in stating that BSD needs an Equity Policy, and that it should address the predictability of student outcomes for students of color, English language learners and students receiving special education services.
- The EAG unanimously recommends the Board draft and approve such an Equity Policy.
- Further, we recommend that the Equity Policy be an overarching governance policy that touches every part of the District.
- We also recommend the Board assemble a diverse community of stakeholders to assist in drafting the Equity Policy.



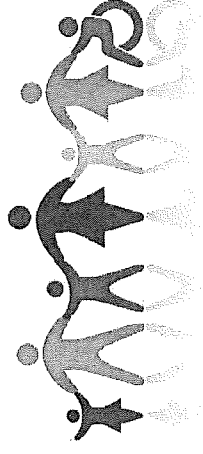
## **WE RECOMMEND THE EQUITY POLICY MAKE PROVISIONS FOR:**



1. Students of color, students with special needs and ELL students
2. Students living in poverty and with inequitable access, students experiencing homelessness, immigrant students, those new to the district, students with different academic abilities, and students with different citizenship status.
3. Recognizing and supporting the importance and needs of caregivers and families of students in #2 above.
4. The sense of belonging of all students.
5. Recognizing the impact that race has on our students' learning experiences, and the historic and current struggles our students of color experience.

## **WE RECOMMEND THE EQUITY POLICY MAKE PROVISIONS FOR:**

6. Recognizing the historic and current reality of students with special needs and English Language learners.
7. Recruiting and retaining staff of color and providing supports so they can be successful in the District.
8. Recognizing that all staff should engage equally in the work of creating an equitable learning environment.
9. The Superintendent to ensure that long-term goals and aspirations with metrics and definitions are identified, articulated and published annually.
10. Annually assessing the adoption and implementation, with fidelity, of the policy.



# PROCEDURAL RECOMMENDATIONS

1. Provide required, on-going and comprehensive training and professional development for staff around implicit bias, anti-discrimination, racial equity, and culturally responsive teaching.
2. Provide procedures for staff and volunteers to deal with racial tensions.
3. Review and improve hiring, recruitment, and retention of highly qualified staff of color, with attention to cultural and systems approaches that will aid teacher success.
4. Provide #1-3 above (training, professional development, procedures, hiring, recruiting and retaining staff) in order to support Special Education students.
5. Provide #1-3 above (training, professional development, procedures, hiring, recruiting and retaining staff) in order to support English language learners.



# PROCEDURAL RECOMMENDATIONS

6. Focus on curriculum development and design that leverages and reflects the unique experiences and social, racial, cultural, linguistic, and familial backgrounds of BSD students.
7. Foster stronger partnerships with diverse groups of parents and stakeholders.
8. Provide equitable resource allocation based on student need.
9. Develop a robust measurement system that utilizes mixed methods (qualitative and quantitative data collection and analysis), over several years, to measure and track how students experience changes related to the new equity policy.
10. Funding and time allocations for staff to implement the policy in relevant ways.



# PROCEDURAL RECOMMENDATIONS

11. Ensure all data reviewed at the District is disaggregated for specific racial and ethnic sub-groups.
12. Ensure equitable and equal access to all district programs that afford advantage, including but not limited to Advanced Learning, all district choice schools, and Advanced Placement and International Baccalaureate coursework.

We also recommend a contractual element for teachers to implement the procedures associated with the policy.





# WHO IS THE EQUITY ADVISORY GROUP?

- 19 EAC members :
  - Parents from each feeder pattern or choice, racial and ethnic diversity, variety of student ages and programs
  - At Large
  - PTSA and Special Needs PTSA
  - Parent Alliance of Black Scholars (PABS)
  - Asian Pacific Islander Alliance (AAPI)
  - Promotores (NISO) Latino Parent Group
  - 6 Teachers or Principals
  - 2 Community Partners
  - 1 Issue Area Expert
- One External Facilitator
- 4 Staff



# EQUITY ADVISORY GROUP MEMBERSHIP

- Alma Gonzalez, Ana Garcia, Chhoun Mey, Haruka Kojima, Huaxia Zhao, Jill Rock, Keri Dutton, Jennifer Hodges, LeAnn Tuupo, Lynn Juniel, Maria Ocampo, Maina Train, Miriam Lara, Myra Arnone, Monica Webster, Paul Sutton, Pia Dey, Stephanie Cherrington, Susie Pietz
- Pat Hughes, Trillium Leadership Consulting
- Staff: Dr. Ivan Duran, Shomari Jones, John Harrison, Eileen Harrity



# NEXT STEPS

- Celebrate
- Thank
- Determine Scope for Phase Two
- Begin Phase Two

